UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

BARBARA AND GEORGE GUINDON, *et al.*,	:	
Plaintiffs	:	
vs.	:	**C.A. No.: 03-335**
AMERICAN FOAM CORP., *et al.*,	:	
Defendants	:	

DEFENDANTS GENERAL FOAM CORPORATION, GFC FOAM, LLC, PMC, INC., AND PMC GLOBAL, INC.'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFFS' THIRD AMENDED MASTER COMPLAINT

Defendants General Foam Corporation, GFC Foam, LLC, PMC, Inc. and PMC Global, Inc.[1] for their Answer and Affirmative Defenses incorporate by reference, as if fully rewritten herein, their Answer and Affirmative Defenses in response to Plaintiffs' Third Amended Master Complaint with the additional parties and causes of action in *Gray, et al. v. Jefferey Derderian, et al.* (C.A. No. 1:04-CV-312-L) as their Answer to Plaintiffs' Notice of Adoption of Third Amended Master Complaint in this case.[2] Further, GFC and PMC incorporate by reference, as if fully rewritten herein, their Answer and Affirmative Defenses in response to the First Amended Master Complaint filed on May 2, 2005, in *Gray, et al. v. Jefferey Derderian, et al.* (C.A. No. 1:04-CV-312-L).

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[1] Defendants General Foam Corporation and GFC Foam LLC are referred to collectively as "GFC"; PMC Inc. and PMC Global, Inc. appear collectively as "PMC."

[2] Plaintiffs have adopted the First Amended Master Complaint and the Third Amended Master Complaint in *Gray, et al. v. Derderian, et al.* and/or have filed a proforma complaint in these proceedings.

WHEREFORE, Defendants General Foam Corporation, GFC Foam, LLC, PMC, Inc. and PMC Global, Inc. pray that:

(a) the Third Amended Master Complaint adopted by Guindon be dismissed with prejudice as to General Foam Corporation, GFC Foam, LLC, PMC, Inc. and PMC Global, Inc.;

(b) Plaintiffs' demand for relief against General Foam Corporation, GFC Foam, LLC, PMC, Inc. and PMC Global, Inc. be denied in every respect;

(c) General Foam Corporation, GFC Foam, LLC, PMC, Inc. and PMC Global, Inc. be awarded costs in connection with this litigation, including reasonable attorneys' fees; and

(d) the Court grant such other and further relief as may be just, proper, and equitable.

Respectfully submitted,

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CERTIFICATION OF SERVICE

I hereby certify that I caused to be served a copy of the within document in pdf format by electronic mail on the 17th day of March, 2006, to the following counsel of record:

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